1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF COLUMBIA

3

4 UNITED STATES OF AMERICA,)
5 Plaintiff,)
6 vs.) No. 98-1232 (TPJ)
7 MICROSOFT CORPORATION,)
8 Defendant.)
9 STATE OF NEW YORK, ex rel. Attorney General DENNIS C.)
10 VACCO, et al.,)
11 Plaintiff,)
12 vs.)
13 MICROSOFT CORPORATION,)
14 Defendant.)
15

60-7371-0014
DEPARTMENT OF JUSTICE
SEP - 3 1998
ANTITRUST DIVISION
SAN FRANCISCO OFFICE

Released: 12/8/98

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17 DEPOSITION OF HADI PARTOVI,

18 a witness herein, taken on behalf of Plaintiff United
19 States of America at 9:17 a.m., Wednesday, September
20 2, 1998, at One Microsoft Way, Building 42, 3607,
21 Redmond, Washington, before Lori D. Casillas, CSR,
22 RPR, pursuant to Notice.

23

24 REPORTED BY:
Lori D. Casillas,
CSR No. 9869, RPR
25 Our File No. 1-49177

Q. What is a DLL?

A. A DLL is a dynamically linked library. It is a package of code that contains subroutines performing particular functions. And it can be used by other code and other applications or other DLLs or operating system functions.

Q. It contains subroutines that execute various functions; is that correct?

A. Correct.

Q. And do those subroutines have a name? Are they generically described in some way? Basically I'm just trying to -- I'm going to ask some more specific questions, I just want to make sure that we're all using the same terminology so that there is no confusion.

A. They're often known as functions.

Q. Is there more than one layer? Is there

1 a hierarchal structure within a DLL? Or are they
2 just a series of functions grouped into this file
3 called a DLL?
4 A. Within a DLL there is no rule on how to
5 organize a set of functions. They are often a
6 straight list of functions. The underlying
7 implementation may be hierarchal.
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14 Q. Turning to Exhibit 686, and specifically
15 the page 9 of that exhibit, the subhead with the
16 No. 1 in front of it.
17 Can you read that to yourself.
18 A. Yes.
19 Q. Okay. Which DLL provides the function
20 that's described here, which is, quote, "Open Windows
21 Explorer, type a web address into the web bar"?
22 A. There is not a single DLL that provides
23 that functionality. There is many DLLs within the
24 operating system.
25 Q. Can you identify those DLLs?

1 A. They would be the USER32.DLL, U-S-E-R,
2 32.DLL, GDI32.DLL, KERNEL32.DLL, K-E-R-N-E-L, 32.DLL,
3 often VGADRV.DLL, SHDOCVW.DLL, SHELL32.DLL,
4 ADVAPI.DLL, COMCTL, C-O-M-C-T-L, 32.DLL.
5 There would be SHLWAPI.DLL, URLMON.DLL,
6 WININET, W-I-N-I-N-E-T, .DLL, WINSOCK.DLL,
7 W-I-N-S-O-C-K, MSHTML.DLL.
8 And there may be others, but that's a
9 pretty long list.
10 Q. Are all of these DLLs components of
11 Internet Explorer?
12 A. I would prefer if you were less
13 ambiguous about the question.
14 Q. What is ambiguous about the question to
15 you?
16 A. I would state the question -- if the
17 question you're asking is which components are
18 included in the downloadable files for upgrading the
19 Windows operating system to Internet Explorer 4.0
20 functionality. I can answer that question.
21 Q. Okay. Which of these DLLs are included
22 in the downloadable version of Internet Explorer 4.0?
23 A. The SHLWAPI.DLL, SHELL32.DLL,
24 SHDOCVW.DLL, COMCTL, C-O-M-C-T-L, 32.DLL,
25 WININET.DLL, URLMON.DLL, MSHMTL.DLL. I think that's

1 all of them.
2 Q. Do you want to look at a list just to
3 make sure?
4 A. Yes.
5 Q. Okay. So having looked at my list,
6 assuming that I wrote everything down right, you've
7 identified all of the files that are included in the
8 downloadable version of Internet Explorer 4.0?
9 A. Yes.
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18 Q. BY MS. DE MORY: With regard to access
19 method No. 1 -- which I'll just call it for shorthand
20 because that's what it's numbered here in response
21 Interrogatory No. 3 -- what function does USER32.DLL
22 provide with regard to that access method?
23 A. USER32.DLL is responsible for managing
24 the child Windows, which is the technical term, that
25 are displayed during the course of all the actions.

1 And child Windows can be window frames or they could
2 be boxes within windows, or for example, the start
3 menu.
4 Q. Okay. So when you were -- so does
5 USERDLL, for instance -- USER32.DLL allow a user to
6 open Windows Explorer? Is that what you're talking
7 about, the function of actually opening that window?
8 A. For example, yes. It also tracks
9 messages of actions the user takes.
10 Q. While inside the window?
11 A. At any point. For example, mouse
12 movements, typing.
13 Q. How about GDI32.DLL, what functionality
14 does that provide with regard to user access method
15 No. 1?
16 A. GDI32.DLL provides drawing subroutines
17 for drawing various UI affordances all along the way
18 from opening the Windows Explorer, typing the web
19 address, and displaying the HTML pages when they
20 return.
21 Q. And when you used UI in that sentence,
22 you meant user interface?
23 A. Yes.
24 Q. So in layman's terms, is this a DLL that
25 actually draws things on the screen, is that

1 essentially what it does?

2 A. Yes.

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